

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MILO H. SEGNER, JR., AS TRUSTEE	§	
OF THE PR LIQUIDATING TRUST,	§	Civil Action No. 3:12-cv-1318-B
	§	
Plaintiff,	§	Bankruptcy Case No. 09-33886-HDH
	§	Adversary Case No. 11-03385-HDH
v.	§	
	§	
RUTHVEN OIL & GAS, LLC, et al.,	§	
	§	
Defendants.	§	

JOINT MOTION TO EXTEND TIME TO FILE JOINT STATUS REPORT

COME NOW Plaintiff, Milo H. Segner, Jr. (“Plaintiff” or “Trustee”), Trustee of the PR Liquidating Trust (“Trust”), and Defendants Ruthven Oil and Gas, LLC, Wendell Holland, the Wendell and Kari Holland Trust, and Cianna Resources, Inc. (collectively “Defendants”) and file this Joint Motion to Extend Time to File Joint Status Report and respectfully would show the Court the following:

1. On October 6, 2015, the Court entered its Status Report Order (Doc. No. 101), which directed the parties to have a face-to-face meeting by October 14, 2015 and file a Joint Status Report by Wednesday, October 21, 2015. The Plaintiff and Defendants moved to extend the time to file that Status Report (Doc. No. 103), which Motion was granted by this Court Order (Doc. No. 104), extending the time to file a Joint Status Report until November 20, 2015.

2. Plaintiff and Defendants respectfully submit that an extension of the November 20, 2015 deadline to file a Joint Status Report is appropriate given that the extension granted by this Honorable Court until November 20, 2015 was instrumental in and has resulted in a settlement with the following Defendants: Ruthven Oil & Gas, LLC, Wendell Holland, and the Wendell and Kari

Holland Trust (the “Settled Defendants”). An Order of Dismissal as to these Defendants has been submitted to the Court, and when entered will end their participation in this case.

3. A mediation has been set with Cianna Resources, Inc., the remaining Defendant, for December 9, 2015 with former Bankruptcy Judge Leif Clark, who was the Mediator in the mediation that led to the settlement with the Settled Defendants.

4. A more cogent and comprehensive Joint Status Report could be given after the results of the mediation with Cianna Resources, Inc. to be held on December 9, 2015 are known.

5. Accordingly, Plaintiff and Defendants jointly request the deadline for submitting a Joint Status Report be extended to Tuesday, December 22, 2015.

6. Plaintiff and Defendants are submitting a proposed Agreed Status Report Order that reflects the requested extension to Tuesday, December 22, 2015 concurrently with this Motion.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants request that their Joint Motion to Extend the Deadline for Joint Status Report be granted and that the Court enter the Agreed Status Report Order submitted concurrently with this Joint Motion.

Respectfully submitted,

/s/ Jerry C. Alexander

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of November, 2015, a true and correct copy of the foregoing was served on counsel of record via ECF/PACER.

/s/ Jerry C. Alexander
Jerry C. Alexander